

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HESHAM ISMAIL,

Plaintiff,

v.

Case 2:20-cv-4801

IHI Power Services Corp., *et al.*,

Defendant.

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL AND FOR AN EQUITABLE
CHARGING LIEN**

Movants, Kathleen Redpath-Perez, Esquire and Law Offices of Eric A. Shore, P.C. (“Movants”) hereby file the following Motion for Leave to Withdraw as Counsel and for an Equitable Charging Lien. In support of this Motion, the undersigned submits a Memorandum of Law in Support of the motion to withdraw and for an equitable charging lien. The undersigned also submits an *ex parte* and *in camera* certification of counsel as well as exhibits that have been filed under seal in support of the motion to withdraw and for an equitable charging lien.

Based on a showing of good cause, Movants respectfully request this Honorable Court grant their motion and permit leave to withdraw as counsel and grant counsel an equitable charging lien for counsels’ attorneys’ fees and costs.

Respectfully submitted,

LAW OFFICES OF ERIC A. SHORE, P.C.

BY: s/ Kathleen Redpath-Perez, Esquire

KATHLEEN REDPATH-PEREZ, ESQUIRE

20 Brace Rd., Suite 325

Cherry Hill, NJ 08034

Attorney for Plaintiff, Hesham Ismail

Dated: June 7, 2023

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CERTIFICATE OF SERVICE

On June 7, 2023, the undersigned served the foregoing Motion to Withdraw as Counsel via email only upon the following:

Elizabeth Dalberth, Esq.
Sweeney & Sheehan, P.C.
1515 Market Street, Suite 1900
Philadelphia, PA 19102

And via Email, Certified, First Class Mail, upon:

Hesham Ismail
19 15th Street
Burlington, NJ 08016
Plaintiff

LAW OFFICES OF ERIC A. SHORE, P.C.

BY: /s/ Kathleen Redpath-Perez, Esquire
KATHLEEN REDPATH-PEREZ, ESQUIRE